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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SAI ZHANG, et al.,

Defendants.

No. CR 23-258-DMG

MOTION TO DISMISS INDICTMENT
PURSUANT TO FEDERAL RULE OF
CRIMINAL PROCEDURE 48(a)

On May 25, 2023, defendants SAI ZHANG, PANYU ZHAO, PEIJI TONG, CHENGWU HE, HANG SU, XUANYI MU, JIAYONG YU, SHUO YANG, XIAOLEI YE, and JIAXUAN HE (collectively, "Defendants") were indicted in the above captioned case. The indictment was filed at Docket Entry No. 12 ("Indictment"). The Indictment contained two counts and two forfeiture allegations. Subsequently, the Defendants were indicted for the same and/or similar charges, among others, in another federal indictment filed under another case number, pending before this Court.

The Acting United States Attorney, having been advised that Defendants has not voiced an objection, moves for a dismissal without prejudice of said Indictment as to all Defendants, pursuant to Rule

1 48(a) of the Federal Rules of Criminal Procedure, in the interests of
2 justice.

3 Dated: March 21, 2025

Respectfully submitted,

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5 /s/

J. MARK CHILDS

6 Assistant United States Attorneys

7 Attorneys for Plaintiff
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